

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

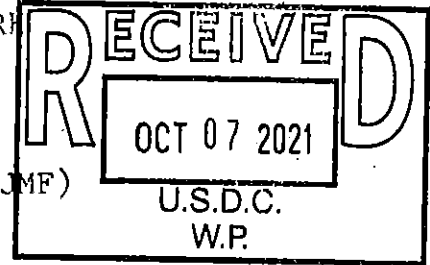
UNITED STATES OF AMERICA,
Plaintiff,

v.

case no. 12-cr-802-1 (JMF)

TREVOR COLE,

Defendant.



MOTION FOR EXTENSION OF TIME:

COMES NOW, TREVOR COLE, Pro Se Litigant, file this motion under leave of court for an extension of time for 30 days. Based on the facts submitted below this court should grant this motion, respectfully.

On or about September 14, 2021, the District Court filed an order granting "an extension to October 8, 2021, to file any reply." see: case no. 12-cr-802-1(JMF), dated: 9/14/21. The government sent a copy of opposition brief (Doc. 324) via certified mail no. 7020 0090 0002.1553 4846, Plaintiff received government's brief on September 18, 2021.

Plaintiff is housed in a High-Security Penitentiary (U.S.P. Lee) in Jonesville, Virginia. At this institution there has been multiple lockdown(s), including access to law library due to: (1) stabbings and assaults between inmates; (2) adverse weather, e.g., fog between 6am and 10:30am; and (3) everyday-modified lockdown(s) at 6:30pm, eveningtime (That means, lockdown in the cell at 6:30pm and doors not unlock until 6:30am, but due to fog-count doors do not open until 7:30am, then go to breakfast and lockdown at 8:00am until 10:30am/11:00am; then doors stay open until 3:30pm, lockdown for inmate-count, unlock again at 5:00pm, then lockdown again at 6:30pm (time subject to change)). Bascially, this is a continuous cycle everyday.

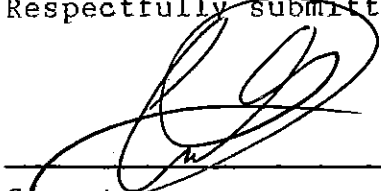
It is based on these harsh conditions that makes it difficult to have access to the court in order to effectively (1) research; (2) draft; and (3) prepare a final brief to submit to the district court. If such motion is not granted, Plaintiff cannot properly address the issues brought forth from the government's opposition response brief.

CONCLUSION:

WHEREFORE, Humbly request this motion to be granted and/or any other relief deemed necessary.

PLAINTIFF FURTHER SAYETH NOT.

Respectfully submitted on this day of 28, September, 2021.

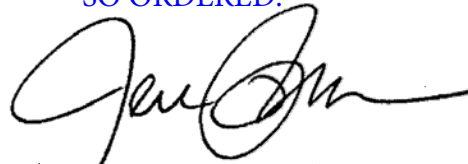


Signature:

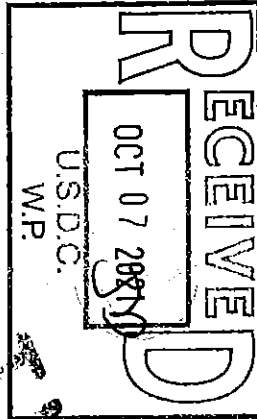
Application GRANTED. Defendant is granted until November 8, 2021, to file any reply.

The Clerk of Court is directed to terminate ECF No. 328 and to mail a copy of this endorsed document to Defendant at: Trevor Cole, Reg. No. 67573-054, U.S.P. Lee, U.S. Penitentiary, P.O. Box 305, Jonesville, VA 24263.

SO ORDERED.


October 8, 2021

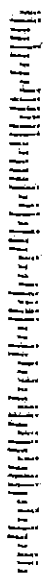
Trevor Cole # 67573-054
United States Penitentiary - Lee
P.O. Box 305
Jonesville, VA 24263



Legal Mail

United States District Court
Office of the Clerk
300 Quarropas Street
Vine Plains, NJ 10601

10601-414000



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12/29/21

U.S. PENITENTIARY - LEE COUNTY
PO Box 900 - Jonesville, VA 24263

DATE 10-1-21

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